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Attorneys for Defendant:
BAO PHUNG

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|----------------------------------|---|---|
| UNITED STATES OF AMERICA, |) | |
| |) | Case No. CR 11-0097 CRB |
| Plaintiff, |) | |
| |) | |
| vs. |) | STIPULATION AND [PROPOSED] ORDER |
| |) | TO MODIFY PRETRIAL RELEASE |
| |) | CONDITIONS |
| |) | |
| BAO PHUNG, |) | |
| |) | |
| Defendant. |) | |

It is hereby Stipulated by the parties in the above-captioned matter that defendant herein, Bao Phung, be allowed to modify his pretrial release conditions as follows:

The conditions that the defendant comply with a curfew and submit to electronic monitoring are deleted.

1 Based upon Bao Phung's compliances thus far, his continued employment
2 and the fact that he pled to a custodial sentence of less than three years, Mr.
3 Anthony R. Granados, the Pretrial Services Officer assigned to this matter, stated
4 that he has no objection to the conditions being modified to delete the
5 conditions that defendant comply with a curfew and submit to electronic
6 monitoring.
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8
9

10 Date: September 13, 2011

By: _____/s/_____
Jeffrey Glenn (SBN. #47357)
BERMAN, GLENN & HAIGHT
Attorney for Defendant,
Bao Phung

14
15 Date: September 13, 2011

By: _____/s/_____
Aaron D. Wegner
Assistant United States Attorney

ORDER

By Stipulation of the parties,

IT IS HEREBY ORDERED that defendant Bao Phung's pretrial release conditions be modified to delete the conditions that he comply with a curfew and submit to an electronic monitoring.

Date: 09/16/2011

By: _____
The Hon. Judge Joseph C. Spero
United States District Judge

